

4

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

UNITED STATES OF AMERICA,

Plaintiff,

v.

RAMIRO C. BARAJAS, Jr.,
also known as "Chito" and "Fig,"

Defendant.

Case:4:22-cr-20539
Judge: Kumar, Shalina D.
MJ: Ivy, Curtis
Filed: 10-19-2022 At 03:19 PM
INDI USA v BARAJAS, JR. (sk)

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE
POSSESSION OF A FIREARM AND AMMUNITION
BY A PROHIBITED PERSON
(18 U.S.C. § 922(g)(1))

On or about August 31, 2021, in the Eastern District of Michigan, RAMIRO C. BARAJAS, Jr., knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm and ammunition, specifically a Smith and Wesson, model M&P shield EZ, .380 caliber pistol and nineteen rounds of .380 caliber ammunition, and the firearm and ammunition were in and affecting commerce, all in violation of Title 18, United States Code, Section 922(g)(1).

COUNT TWO
POSSESSION OF A FIREARM AND AMMUNITION
BY A PROHIBITED PERSON
(18 U.S.C. § 922(g)(1))

On or about January 12, 2022, in the Eastern District of Michigan, RAMIRO C. BARAJAS, Jr., knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm and ammunition, specifically a SCCY Industries, model CPX-1, 9mm caliber pistol and assorted rounds of 9mm caliber ammunition, and the firearm and ammunition were in and affecting commerce, all in violation of Title 18, United States Code, Section 922(g)(1).

COUNT THREE
POSSESSION OF A FIREARM AND AMMUNITION
BY A PROHIBITED PERSON
(18 U.S.C. § 922(g)(1))

On or about September 20, 2022, in the Eastern District of Michigan, RAMIRO C. BARAJAS, Jr., knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm and ammunition, specifically a Davis Industries, model P380, .380 caliber pistol and ten rounds of .380 caliber ammunition, and the firearm and ammunition were in and affecting commerce, all in violation of Title 18, United States Code, Section 922(g)(1).

FORFEITURE ALLEGATION- FIREARM AND AMMUNITION
(18 U.S.C. § 924(d)(1))

The allegations contained in Counts One, Two and Three of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d)(1) together with Title 28, United States Code, Section 2461.

Upon conviction of any offense charged in Counts One, Two or Three, RAMIRO C. BARAJAS, Jr, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1), any firearm or ammunition involved in said offense.

THIS IS A TRUE BILL.

Dated: October 19, 2022

s/Grand Jury Foreperson
GRAND JURY FOREPERSON

DAWN N. ISON
United States Attorney

s/JULES M. DEPORRE
JULES M. DePORRE (P73999)
Assistant United States Attorney
600 Church Street
Flint, Michigan 48502-1280
Telephone (810) 766-5177
Jules.DePorre@usdoj.gov

s/ANTHONY P. VANCE
ANTHONY P. VANCE (P61148)
Assistant United States Attorney
Chief, Branch Offices

Companion Case information MUST be completed byUnited States District Court
Eastern District of Michigan**Criminal Case C**

Case:4:22-cr-20539

Judge: Kumar, Shalina D.

MJ: Ivy, Curtis

Filed: 10-19-2022 At 03:19 PM

INDI USA v BARAJAS, JR. (sk)

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: JMD

Case Title: USA v. Ramiro C. Barajas, Jr.County where offense occurred : GeneseeCheck One: ☒ Felony ☐ Misdemeanor ☐ Petty Indictment/ Information --- no prior complaint. X Indictment/ Information --- based upon prior complaint [Case number: 22-mj-30401] Indictment/ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].**Superseding Case Information**

Superseding to Case No: _____ Judge: _____

- ☐ Original case was terminated; no additional charges or defendants.
- ☐ Corrects errors; no additional charges or defendants.
- ☐ Involves, for plea purposes, different charges or adds counts.
- ☐ Embraces same subject matter but adds the additional defendants or charges below:

Defendant nameChargesPrior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

October 19, 2022

Date

s/Jules M. DePorre

Jules M. DePorre
Assistant United States Attorney
210 Federal Building
600 Church Street
Flint, Michigan 48502
Telephone: (810) 766-5177
Email: Jules.DePorre@usdoj.gov
P73999

¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.